

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:

**1960 FAMILY PRACTICE, PA
DEBTOR**

**CASE NO. 20-35493
(Chapter 7)**

**EVA S. ENGELHART, CHAPTER 7
TRUSTEE**

PLAINTIFF

v.

**HUONG LE, EXPRESS SPECIALTY
PHARMACY, LLC, ALLERGY OF
TEXAS PLLC, AND PHYSICIANS
ALLIANCE OF RED OAK, LP
DEFENDANTS**

ADVERSARY NO. 21-3906

AMENDED PLAINTIFF'S RULE 26(A) INITIAL DISCLOSURES

1. **Rule 26(a)(1)(A)(i).** Plaintiff believes at present the following individuals have discoverable information about the subject matter of this litigation and may provide testimony that Plaintiffs may use for support in this case:

NAME	CONTACT INFORMATION	SUBJECT MATTER
EVA S. ENGELHART	c/o Miriam Goott mgoott@walkerandpatterson.com Walker & Patterson, PC P.O. Box 61301 Houston, Texas 77208 713.956.5577	Allegations contained in complaint, damages including attorney's fees and costs.
MIRIAM GOOTT AND/OR	P.O. Box 61301 Houston, TX 77208 713.956.5577	Attorney's fees and costs accrued in this litigation.

JOHNIE PATTERSON	mgoott@walkerandpatterson.com	
DR. HUONG LE	c/o Aaron J. Power Porter Hedges LLP 1000 Main Street, 36th Floor Houston, Texas 77002 713-226-6631	Allegations contained in the complaint and defenses raised in Answer. In addition her relationship to entities and her financial condition contained in her personal financial statement previously produced to her counsel.
UMMC	Corporate Representative of Doctors Hospital 1997, LP d/b/a UMMC c/o Will Haddock Pendergraft & Simon LLP 2777 Allen Parkway, #800 Houston, TX 77019 713-528-8555	Allegations contained in the complaint, including the terms of the APA, and related negotiations.
Ravi Mallapuram	c/o Will Haddock Pendergraft & Simon LLP 2777 Allen Parkway, #800 Houston, TX 77019 713-528-8555	Allegations contained in the complaint, including the terms of the APA, and related negotiations.
Stacy Williams	c/o Aaron J. Power Porter Hedges LLP 1000 Main Street, 36th Floor Houston, Texas 77002 713-226-6631	Allegations contained in the complaint and defenses raised in Answer, including transfers of funds and directions given to her by Dr. Le.
Patricia McConnell	c/o Aaron J. Power Porter Hedges LLP 1000 Main Street, 36th Floor Houston, Texas 77002 713-226-6631	Allegations contained in the complaint and defenses raised in Answer, including transfers of funds, directions given to her by Dr. Le. Conversations had with DeLagarza.
Hemant Khemka	The Larkin Group 6800 West Loop South, Suite 300 Bellaire, TX 77401 713-838-0800 hkhemka@larkingroup.com	Allegations contained in the complaint and defenses raised in Answer, including transfers of property.
Dan de la Garza	dandlgmm@gmail.com	Allegations contained in the complaint and defenses raised in Answer, including Dr. Le's actions/promises in transferring debtor's assets, as well as offer to purchase the pharmacy.
MARY MCKINNEY	mary@tricountypharmacy.com 936-247-5050	

RON SOMMERS	Nathan Sommers Jacobs 2800 Post Oak Blvd 61 st Floor Houston, TX 77056 713-892-4800	Communications with the Debtor regarding allegations in the complaint. Communications with the Trustee regarding the allegations contained in the complaint.
JULIA VALDEZ 713-624-2716	Contact info to be amended once received.	Allegations contained in the complaint and defenses raised in Answer, including Dr. Le's actions/promises in transferring debtor's assets, as well as pharmacy matters, lease related to the pharmacy.
MINH CHI NGUYEN	50 Palmer Crest Woodlands, TX 77381	Allegations contained in the complaint and defenses raised in Answer, including MOU between Bellwellness Pharmacy, LLC and Express Specialty Pharmacy, Dr. Nguyen, Dr. M. C. Nguyen.
ARIN TIJERINA	Contact info to be amended once received.	Allegations contained in the complaint and defenses raised in Answer.
MICHELE NGUYEN	Contact info to be amended once received.	Allegations contained in the complaint and defenses raised in Answer, including signing of narcotics invoices.
PATRICIA	Contact info to be amended once received.	Former employee who has information regarding the pharmacy.
YASCADA	Contact info to be amended once received.	Technician was a tech that had discussion and received instructions from Dr. Le.
MICHAEL NGUYEN	Physicians Alliance of Red Oak, LP c/o Michael J. Durschmidt Hirsch & Westheimer, P.C. 1415 Louisiana, 36th Floor Houston, Texas 77002 713-220-9165	Allegations contained in the complaint and defenses raised in Answer.

ALLERGY OF TEXAS PLLC	c/o Aaron J. Power Porter Hedges LLP 1000 Main Street, 36th Floor Houston, Texas 77002 713-226-6631	Allegations contained in the complaint and defenses raised in Answer.
EXPRESS SPECIALTY PHARMACY, LLC	c/o Will Haddock Pendergraft & Simon LLP 2777 Allen Parkway, #800 Houston, Texas 77019 713-528-8555	Allegations contained in the complaint and defenses raised in Answer.
JAMES POPE		Communications with Debtor re allegations in complaint.
PHYSICIANS ALLIANCE OF RED OAK	Physicians Alliance of Red Oak, LP c/o Michael J. Durrsschmidt Hirsch & Westheimer, P.C. 1415 Louisiana, 36th Floor Houston, Texas 77002 713-220-9165	Allegations contained in the complaint and defenses raised in Answer.
MICHAEL J. DURRSCHMIDT KIM LEWINSKI	Hirsch & Westheimer, P.C. 1415 Louisiana, 36th Floor Houston, Texas 77002 713-223-5181	Allegations contained in the complaint and defenses raised in Answer.
DR. LE'S DAUGHTER, SON AND SON-IN-LAW	c/o Aaron J. Power Porter Hedges LLP 1000 Main Street, 36th Floor Houston, Texas 77002 713-226-6631	Allegations contained in the complaint and defenses raised in Answer.
DAVID ELLENT, MD	c/o Ashish Mehundru Phone: 713-571-1519 Fax: 713-651-0776 Email: amahendru@thelitigationgroup.com	Prior offer to purchase the Debtor

2. **Rule 26(a)(1)(A)(ii).** Plaintiffs' description by category of its Rule 26(a)(1)(A)(ii) disclosures: All documents subject to disclosure under this provision will be voluntarily provided to the Defendants upon request.

3. **Rule 26(a)(1)(A)(iii).** Plaintiff will seek actual damages from the Defendants, plus attorney fees and costs incurred in the prosecution of this adversary proceeding. Total attorney fees and costs are unknown at this point, but time records are kept by counsel and will be provided prior to trial.

4. **Rule 26(a)(1)(A)(iv).** Plaintiff is unaware of any insurance policies relevant to the pending litigation.

5. **Rule 26(a)(2).** Plaintiff intends on using expert testimony at trial regarding the value of the Debtor's business and damages. Plaintiff intends on using John Baumgartner and his team at Grant Thornton to provide expert testimony regarding valuation of the assets transferred and damages sustained by the Debtor.

Dated: June 14, 2022.

Respectfully submitted,

/s/ Miriam Goott
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COUNSEL FOR TRUSTEE